

# DOCKET SECTION

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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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Docket No. R97-1

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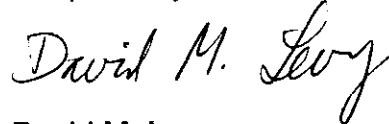
Postal Rate And Fee Changes, 1997

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## RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS TO INTERROGATORIES USPS/ANM-1 THROUGH -34

The Alliance of Nonprofit Mailers hereby provides responses to interrogatories USPS/ANM-1 through -34. Each interrogatory is stated verbatim and followed by a response.

Respectfully submitted,



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February 5, 1998

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-1. For each year fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide a list of publications published by each member of your trade association and mailed at second-class regular or periodical regular rates.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. However, in an attempt to be partially responsive, a listing of ANM members is attached. Information about the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-2. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please for each publication listed in response to interrogatory number 1 the following information:

- (a) The number of issues mailed.
- (b) The average number of editions (versions) per issue.
- (c) An indication of the kind or type of each version.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-3. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the total volumes mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-4. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular required presort rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-5. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular 3-digit city/5-digit presort rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-6. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular carrier route presort rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-7. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination delivery office discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.



**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-8. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination SCF discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-9. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular high density discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-10. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular saturation discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-11. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the required presort volumes mailed at second-class regular or periodical regular prebarcoded letter size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-12. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-13. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 3-digit letter size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-14. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 5-digit letter size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-15. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.



**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-16. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zones 1&2 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-17. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 3 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-18. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 4 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-19. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 5 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-20. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 6 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-21. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 7 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-22. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 8 for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-23. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the average percentage of nonadvertising content mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.



**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-24. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-25. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per pallet by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-26. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average pallet weight by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-27. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-28. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per sack by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-29. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-30. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per tray by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-31. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.



**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-32. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per bundle.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-33. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular rates that were plant loaded in USPS provided transportation for each publication listed in response to interrogatory number 1.

**RESPONSE**

ANM does not have the requested information (beyond the information that ANM has previously submitted to the Postal Service in rate and classification cases since 1986). Nonprofit mailers are not asked to provide such information as a condition of membership in ANM. Responsive information for the entire universe of publications entered at second-class or periodical regular rates -- not just the subset entered by ANM members -- should be available on mailing statements in the possession of the Postal Service.

**RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/ANM-34. Please also provide all data furnished in response to interrogatories 1 through 33 above in electronic format.

**RESPONSE**

Not applicable.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Levy

February 5, 1998